

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

UNITED STATES)
)
)
v.) **Case No. 24-cr-00180**
)
)
RYAN MACAULAY,)
Defendant)

**MOTION TO TRAVEL AND TO
TEMPORARILY RETURN PASSPORT**

Ryan Macaulay, by and through undersigned counsel respectfully requests this Court allow Mr. Macaulay to travel internationally and to allow the temporary return of his passport.

In support of this Motion, Mr. Macaulay states the following:

1. On August 15, 2024, Mr. Macaulay was charged by Indictment and Superseding Indictment with Conspiracy to Commit Bank Fraud, in violation of 18 U.S.C. § 1349, and related offenses. *See* Dkt. No. 1 and 38.
2. Mr. Macaulay's jury trial was originally set for January 22, 2025, but has now been continued to April 22, 2025. *See* Dkt. No. 34 and 61.
3. Mr. Macaulay's close friends are getting married in the Philippines this month, and he would like to be able to visit with them and celebrate their union.
4. Mr. Macaulay has been on pretrial supervision since August 22, 2024, has been compliant with all restrictions, and has been allowed international travel for work purposes so he can maintain his livelihood during the pendency of this case.
5. Mr. Macaulay would require his passport be temporarily returned to him to travel internationally to the Philippines for this trip.

6. Counsel conferred with pretrial services, and they indicated they oppose this request.

7. Counsel also conferred with the government, who indicated that they also oppose this request.

WHEREFORE, for the forgoing reasons, Mr. Macaulay respectfully requests that this Court grant his request to travel internationally to Manilla, Philippines, from December 29, 2024 through January 11, 2025, and to allow his passport to be temporarily returned to him for this trip.

Respectfully submitted,

/s/
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Counsel for Ryan Macaulay

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of December, 2024, a copy of the foregoing Motion to Travel and to Temporarily Return Passport has been served via CM/ECF upon the parties in this matter.

/s/
David B. Benowitz